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United States Senate
COMMITTEE ON THE JUDICIARY
WASHINGTON, DC 20510-6275

May 5, 2025

VIA ELECTRONIC TRANSMISSION

The Honorable Robert F. Kennedy Jr.
Secretary
Department of Health and Human Services

Dear Secretary Kennedy:

On February 27, 2023, 36 Attorneys General (AGs), wrote to Congress expressing their concerns with the Polaris Project, which has been the sole contractor operating the National Human Trafficking Hotline (NHTH) since 2007.[1] This letter noted that Polaris, which is funded by taxpayer dollars, "is not reporting tips of adult trafficking to state law enforcement except under the limited circumstance where the victim self-reports and affirmatively consents to the Hotline making the report."[2] More recently, on April 15, 2025, 41 AGs sent you a letter regarding the notice of funding opportunity (NOFO) for the grant to operate the NHTH.[3] This letter raised multiple concerns about Polaris's operation of the hotline.[4] Specifically, the AGs stated that Polaris was "no longer sharing tips from concerned citizens and distressed family members with local law enforcement."[5] These alleged failures by Polaris to report instances of human trafficking are deeply concerning and, if they are accurate, changes to the operation of the NHTH must be made.

Additionally, according to reports, Katherine Chon, the co-founder of Polaris, is a "senior adviser at [the Department of Health and Human Services (HHS)] and its director of the Office on Trafficking in Persons [OTIP]," the office awarding the grant.[6] Given the importance of the NHTH, you must not allow conflicts of interest to affect the contracting process.

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[1] Letter from the National Association of Attorneys General, to the Honorable Chuck Schumer, Senate Majority Leader, the Honorable Mitch McConnell, Senate Minority Leader, the Honorable Kevin McCarthy, Speaker of the House, and the Honorable Hakeem Jefferies, House Minority Leader (Feb. 27, 2023), https://legacy.myfloridalegal.com/webfiles.nsf/WF/CPAL-CPGMM7/$file/Web%20Link.pdf.

[2] *Id.*

[3] Letter from the National Association of Attorneys General, to the Honorable Robert F. Kennedy Jr., Secretary, Department of Health and Human Services (Apr. 15, 2025), https://oag.ca.gov/system/files/attachments/press-docs/National%20Human%20Trafficking%20Hotline_FINAL.pdf.

[4] *Id.*

[5] *Id.*

[6] James Lynch, *National Human Trafficking Hotline Accused of Failing to Share Tips with Law Enforcement* (Apr. 29, 2025), National Review, https://www.nationalreview.com/news/national-human-trafficking-hotline-accused-of-failing-to-share-tips-with-law-enforcement/; Elizabeth Smart, *America's National Human Trafficking Hotline is failing those who need it the most — there should be federal reform, famous ex-victim says* (Apr. 29, 2025), NY Post, https://nypost.com/2025/04/29/opinion/famous-ex-victim-elizabeth-smart-says-americas-national-human-trafficking-hotline-is-failing-those-who-need-it-the-most-there-should-be-federal-reform/.

Legally protected whistleblower disclosures provided to my office appear to confirm the allegations that Polaris is not reporting instances of potential human trafficking to law enforcement.[7] For example, according to an internal Polaris case file, in March 2025, an anonymous "signaler" contacted the NHTH and reported a "possible [sex trafficking (ST)] situation."[8] Polaris staff marked "Yes" for the case referencing potential minors and deemed the "Level of Trafficking Indicators" as having "High Indicators."[9] The case file also noted that the estimated age range of potential victims were "15-17; 18-21; 22+," and that the potential victim indicated to the signaler she wanted police involvement.[10] The case file further indicates that, according to the signaler, the potential victim is afraid "[s]he's going to be physically hurt by the pimp running this company. She's being forced to escort for sex and money."[11] It also notes that there are no existing reports to law enforcement.[12] The signaler also disclosed that the individual accused of trafficking the victim also forces other women, potentially minors, to engage in these types of acts.[13] Unfortunately, according to the records obtained by my office, a member of Polaris's staff reviewed and labeled the file "Work Not Required."[14] A whistleblower told my office that this means the case is closed and law enforcement has not been alerted.[15]

Another legally protected whistleblower disclosure to my office shows similar concerning behavior by Polaris and its staff. According to records provided to my office, in February 2025, a potential victim contacted the NHTH to report a "situation of [sex trafficking (ST)] involving herself and her minor sister."[16] According to the records, the potential victim and her minor sister were being held by two potential traffickers.[17] Additionally, the case file notes that both of the potential victims were United States citizens and that the "Level of Trafficking Indicators" was marked as having "High Indicators."[18] Further, according to the records, the potential victim "[w]ishe[d] to report, not anonymously."[19] However, the Polaris case file noted that the potential victim stopped communicating "due to safety concerns."[20] The case file status is described as "unclear situation as [potential victim (PV)] stopped responding" and "Work Not Required."[21] According to legally protected disclosures to my office, that means Polaris staff failed to report this potential trafficking to law enforcement and no other action was taken.[22]

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[7] Letter from Tristan Leavitt, President, Empower Oversight to Megan Lundstrom, Chief Executive Officer, Polaris (Apr. 25, 2025), Exhibit 1; Exhibit 2; Exhibit 3;
[8] Exhibit 2. ("Signaler" indicates that someone other than the potential victim contacted the NHTH.)
[9] *Id.*
[10] *Id.*
[11] *Id.*
[12] *Id.*
[13] *Id.*
[14] *Id.*
[15] Notes on File with Committee Staff.
[16] Exhibit 3.
[17] *Id.*
[18] *Id.*
[19] *Id.*
[20] *Id.*
[21] Exhibit 3.
[22] Notes on File with Committee Staff.

As you are aware, Polaris has received millions in taxpayer dollars to run this hotline, and if the grant is renewed, will receive an additional $9 million in funding.[23] It's imperative that HHS ensure the hotline is running efficiently and effectively to protect the countless victims of human trafficking. Additionally, for Congress to better understand HHS's oversight of the hotline and the Polaris Project, please provide answers to the following by May 19, 2025:

1. Does "Work Not Required" mean that law enforcement was not informed of the information?

2. What steps has HHS taken to address the complaints raised by the Attorneys General letters from 2023 and 2025? Provide all records.[24]

3. What specific steps has HHS taken to oversee Polaris and ensure its properly reporting tips the hotline receives? Provide all records.

4. What steps has HHS taken to ensure the apparent conflicts of interest between Polaris and Ms. Chon do not affect the contracting process? Has Ms. Chon been walled off from these matters? If not, why not? If so, provide all recusal records.

Thank you for your prompt review and response. If you have any questions, please contact Tucker Akin with my Committee staff at (202) 224-5225.

Sincerely,

Charles E. Grassley
Chairman
Committee on the Judiciary

[23] Simpler Grants.gov, *National Human Trafficking Hotline* (NHTH) (Mar. 28, 2025), Office on Trafficking in Persons), https://simpler.grants.gov/opportunity/355255.

[24] "Records" include any written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically created or stored information), calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether they resulted in final documents).

EXHIBIT 1

EMPOWER OVERSIGHT

Whistleblowers & Research

EMPOWR.us

April 25, 2025

Megan Lundstrom
Chief Executive Officer
Polaris
1110 Vermont Ave NW, Suite 1000
Washington, D.C. 20005-3551

Dear Ms. Lundstrom:

Empower Oversight is a nonpartisan, nonprofit educational organization dedicated to enhancing independent oversight of government and corporate wrongdoing. We work to help insiders safely and legally report waste, fraud, abuse, corruption, and misconduct to the proper authorities.

We represent [redacted], an employee of Polaris who was placed on administrative leave yesterday afternoon. Managing Director Heather Lynn Wagner described the move as "a temporary step . . . to ensure space for thoughtful review and care as [Polaris] navigate[s] some ongoing considerations." However, the substance of these "ongoing considerations" is unclear.

As [redacted] noted in her own email to Ms. Wagner and others last Friday, she has made numerous protected whistleblower disclosures within the organization. [redacted] has also made numerous protected disclosures outside of the organization to various authorized governmental recipients, including the Department of Health and Human Services ("HHS") Office of Inspector General ("OIG") and Congress.

[redacted]' disclosures are consistent with concerns recently expressed by the National Association of Attorneys General, who wrote on April 15, 2025 to HHS Secretary Robert F. Kennedy Jr.: "Without [certain] tips, our law enforcement loses critical leads to dismantling trafficking operations. We also lose valuable leads to rescuing the victims of trafficking and helping them begin the road to recovery."[1]

Your internal handbook details your "policy with respect to reporting good-faith concerns about the legality or propriety of Polaris actions or plans." It states: "This policy makes it clear that you can do so without fear of retaliation of any kind, including but not limited to discrimination or harassment."

[1] https://ncdoj.gov/wp-content/uploads/2025/04/National-Human-Trafficking-Hotline_FINAL.pdf.

[redacted]

Additionally, 41 U.S.C. § 4712, which I helped enact into law as Judiciary Committee counsel to then-Ranking Member Chuck Grassley, states:

> An employee of a contractor, subcontractor, grantee, subgrantee, or personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing to a [covered] person or body . . . information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant.

The covered entities for which protected disclosures are authorized include congressional committees, inspectors general, and "a management official or other employee of the contractor . . . [or] grantee . . . who has the responsibility to investigate, discover, or address misconduct."

We are in communication with the HHS OIG regarding [redacted] placement on administrative leave. In order to better understand Polaris's position in this matter, we request that you provide a more specific explanation as to why [redacted] was placed on administrative leave.

Thank you for your prompt attention to this matter.

Cordially,

/Tristan Leavitt/
Tristan Leavitt
President
Empower Oversight

cc: Chairman Charles E. Grassley
Committee on the Judiciary
U.S. Senate

[redacted]

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April 15, 2025

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health & Human Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W.
Washington, D.C. 20201

Subject: National Human Trafficking Hotline (Funding Opportunity No. HHS-20250ACF-IOAS-OTIP-ZV-0002)

Dear Secretary Kennedy:

Your agency plays a vital role in the fight to end the growing and persistent criminal enterprise of human trafficking through the National Human Trafficking Hotline, which is funded through a grant from HHS' Administration for Children & Families. As Attorneys General, we are dedicated partners in this effort, as well. We advocate for legislative changes to support anti-trafficking efforts and victim services. We raise public awareness about trafficking. And we support and engage in law enforcement efforts to disrupt trafficking operations and hold the perpetrators accountable.

The National Human Trafficking Hotline had long been an integral part of our work, until it was discovered a few years ago that the organization awarded the grant to run the Hotline, Polaris, was no longer sharing tips from concerned citizens and distressed family members with local law enforcement. Without those tips, our law enforcement loses critical leads to dismantling trafficking operations. We also lose valuable leads to rescuing the victims of trafficking and helping them begin the road to recovery.

To be clear, we are not asking that the Hotline report calls from victims who say they do not want their call reported. But we are asking them to send us the tips they get from anyone other than the victim. We are asking for the tips from the trucker who sees suspicious behavior on the road, the flight attendant who notices something unusual in the airport, the front desk clerk who sees something that

does not make sense at their motel, or the citizen who sees the same woman being abused at the corner market week after week. Those tips matter, and reporting those tips can save lives.

The notice of funding opportunity posted on January 16, 2025, indicates that notifying law enforcement of potential cases of human trafficking is a function of the Hotline. Last year, your predecessor, in a response to a QFR posed by Senator Cindy Hyde-Smith, and in response to concerns raised by a bipartisan coalition of 36 Attorneys General, indicated that the Department of Health and Human Services was taking steps to ensure that the Hotline would return to a better working relationship with law enforcement. In fact, then-Secretary Becerra stated that the Administration for Children and Families was "incorporating additional language in the next NOFO outlining specific coordination requirements with law enforcement."

The current NOFO does, in fact, include a requirement for the awardee to develop a plan to strategically engage law enforcement and to determine how to report tips to law enforcement. We cannot stress enough the importance of ensuring that this year's awardee is committed to notifying law enforcement of tips it receives from a vigilant public. As Attorneys General, we spent years attempting to engage with Polaris in an honest dialogue about how vital those tips are to our efforts to help human trafficking victims. But in the end, we were unable to convince them of this necessity.

The grant's notice currently lists the closing date for applications as May 2, 2025. As you consider applicants, we urge you to ensure that the organization that is awarded the grant for the National Human Trafficking Hotline demonstrates its commitment to being a partner to our offices and local law enforcement with timely reports of trafficking tips. We have worked hard to teach the public the signs of trafficking and how to report it when they think they see it. But sending the public to the Hotline when they see someone in trouble is futile if the organization running it refuses to share those tips and share them in a timely manner.

We are committed to ending human trafficking and to helping its victims become survivors, recovering without shame or blame. And we offer ourselves as a resource to your team if you would like to discuss how we can partner to end human trafficking. We look forward to working with the new administrator of the Hotline and with you and your office to restore hope, dignity, and peace of mind to the victims of human trafficking.

Sincerely,

Kathleen Jennings
Delaware Attorney General

Liz Murrill
Louisiana Attorney General

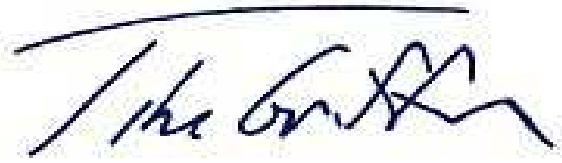
Lynn Fitch
Mississippi Attorney General

Aaron D. Ford
Nevada Attorney General

Steve Marshall
Alabama Attorney General

Treg R. Taylor
Alaska Attorney General

Gwen Tauiliili-Langkilde
American Samoa Attorney General (Acting)



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Arkansas Attorney General

Rob Bonta
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Phil Weiser
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Christopher M. Carr
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Brenna Bird
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Russell Coleman
Kentucky Attorney General

Dana Nessel
Michigan Attorney General

Andrew Bailey
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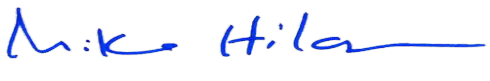
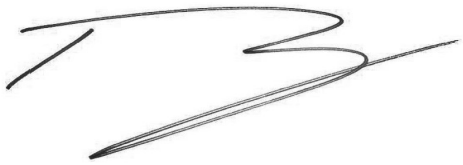


Mike Hilgers
Nebraska Attorney General

John M. Formella
New Hampshire Attorney General



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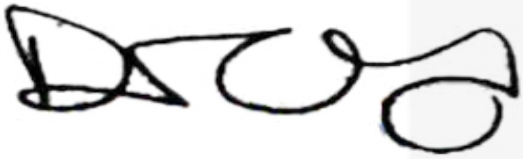

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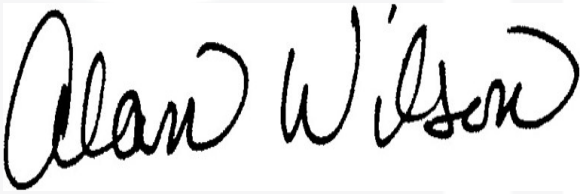

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Derek Brown
Utah Attorney General

Charity Clark
Vermont Attorney General

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John "JB" McCuskey
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